

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE**

FROST SOLUTIONS, LLC,

Plaintiff,

v.

PATRICK BAGLIEN, CHRISTOPHER LAREAU,
and VUE ROBOTICS, LLC,

Defendants.

Civ. Action No. 1:22-cv-00401-SE

JOINT MOTION FOR RULE 16 CONFERENCE

Plaintiff, Frost Solutions, LLC, and Defendants Patrick Baglien, Christopher Lareau, and Vue Robotics, LLC (collectively “the Parties”) hereby move for a Rule 16 Conference. In support of this Motion, the Parties state as follows:

1. Pursuant to Fed. R. Civ. P. 16 (c)(2)(F)(H) (I), and (P), the Parties request a conference at the Court’s earliest opportunity so that they may discuss with the Court their desired plan to (a) promptly schedule a zoom mediation with Magistrate Judge Johnstone; (b) stay discovery and rulings on all pending motions until after completion of the scheduled mediation; and (c) reasonably extend existing and future litigation deadlines.

2. The Parties believe this plan may save judicial and the Parties’ resources.

3. Given the nature of this Joint Motion, the Parties do not believe a Local Rule 7.1(a)(2) Memorandum is required.

WHEREFORE, the Parties respectfully request that the Court issue an order:

- A. Scheduling a Rule 16 Conference at the Court's earliest opportunity (allowing remote participation through Zoom if the Court is so inclined); and
- B. Granting such further and additional relief as the Court deems just and equitable.

Dated: May 8, 2024

Respectfully submitted,

FROST SOLUTIONS, LLC,

PATRICK BAGLIEN, CHRISTOPHER
LAREAU, AND VUE ROBOTICS, LLC

/s/ Laura L. Carroll

/s/ David W. McGrath

By its attorneys,
Laura L. Carroll (NH Bar No. 17444)
BURNS & LEVINSON LLP
125 High Street
Boston, MA 02110
Tel: (617) 345-3000
Fax: (617) 345-3299
Email: lc Carroll@burnslev.com

By their attorneys,
David W. McGrath (NH Bar No. 9347)
James P. Harris (N.H. Bar No. 15336)
Ryan P. Lirette (N.H. Bar No. 19561)
Sheehan Phinney Bass & Green, P.A.
1000 Elm Street, 17th Floor
Manchester, NH 03101
Tel: (603) 627-8255
Fax: (603) 641-2349
dmcgrath@sheehan.com
jharris@sheehan.com
rlirette@sheehan.com

Todd A. Rowden (admitted *pro hac vice*)
James L. Oakley (admitted *pro hac vice*)
T. Hudson Cross, IV (admitted *pro hac vice*)
TAFT STETTINIUS & HOLLISTER LLP
111 East Wacker Drive, Suite 2600
Chicago, IL 60601
Tel: (312) 527-4000
Fax: (312) 527-4011
Email: trowden@taftlaw.com
joakley@taftlaw.com
hcross@taftlaw.com

Kierstan E. Schultz (N.H. Bar No. 20682)
NIXON PEABODY LLP
900 Elm Street, 14th Floor
Manchester, NH 03101
Tel: (603) 628-4031
Fax: (603) 628-4040
Email: kschultz@nixonpeabody.com

Amir R. Tahmassebi (admitted *pro hac vice*)
KONICEK & DILLON, P.C.
70 West Madison Street, Suite 2060
Chicago, IL 60602
Tel: (312) 328-9166
Fax: (630) 262-9659
Email: amir@konicekdillonlaw.com

Jason C. Kravitz (admitted *pro hac vice*)
Gina M. McCreadie (admitted *pro hac vice*)
NIXON PEABODY LLP
Exchange Place 53 State Street
Boston, Massachusetts 02109
Tel: (617) 345-1000
Fax: (617) 345-1300
Email: jkravitz@nixonpeabody.com
gmccreadie@nixonpeabody.com

